

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

| | | |
|--------------------------|---|----------------------|
| RENEE M. BUTZ, | : | C.A. No.: 05-495 SLR |
| | : | |
| Plaintiff, | : | |
| | : | |
| v. | : | |
| | : | |
| LAWNS UNLIMITED LTD, AND | : | |
| EDWARD FLEMING | : | |
| | : | |
| Defendants. | : | |

ANSWER

Defendants hereby respond to the numbered paragraphs of the Complaint herein as follows:

1. This paragraph states legal conclusions to which no response is required.
2. Defendants lack knowledge or information sufficient to form a belief as to the truth of the matter alleged.
3. Admitted that Defendant Lawns Unlimited, LTD is a corporation of the State of Delaware which has a business address of 15089 Coastal Highway, Milton, Delaware 19968.
4. Denied.
5. Denied.
6. Denied that any discriminatory practice occurred; admitted that it is not continuing.
7. Defendants lack knowledge or information sufficient to form a belief as to the truth of the matter alleged.

8. Defendants lack knowledge or information sufficient to form a belief as to the truth of the matter alleged.
9. Defendants lack knowledge or information sufficient to form a belief as to the truth of the matter alleged.
10. Denied.
11. Denied.
12. Denied.
13. Denied.
14. Denied.

FIRST AFFIRMATIVE DEFENSE

15. The complaint fails to state a claim upon which relief may be granted.

SECOND AFFIRMATIVE DEFENSE

16. The complaint is bared by the applicable statute of limitations.

WHEREFORE Defendants demand that judgment be entered in their favor and against Plaintiff on the basis of any or all of the defenses set out above, with all the cost of this action, including reasonable attorneys fees, taxed to Plaintiff.

WILSON, HALBROOK & BAYARD, P.A.

By: 

Eric C. Howard, Esquire (#2066)
(302) 856-0015
Attorneys for Defendants

Dated: May 2, 2006

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CERTIFICATE OF SERVICE

WILSON, HALBROOK & BAYARD, P.A., hereby certifies that on this day, May 2, 2006, one true and correct copy of the foregoing **ANSWER** were forwarded to:

Renee M. Butz
58 Hickory Drive
Northeast, MD 21901

By being mailed through the UPS next day air (tracking number 1Z FX9 597 22 1000 464 4) on the 2 day of May 2006.

WILSON, HALBROOK & BAYARD, P.A.

By: 

Eric C. Howard, Esquire (#2066)
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Dated: May 2, 2006